

EXHIBIT A

RANDALL S. LUSKEY (SBN: 240915)
 rluskey@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
 & GARRISON LLP**
 535 Mission Street, 24th Floor
 San Francisco, CA 94105
 Telephone: (628) 432-5100
 Facsimile: (628) 232-3101

ROBERT ATKINS (*Pro Hac Vice* admitted)
 ratkins@paulweiss.com
 CAITLIN E. GRUSAUSKAS (*Pro Hac Vice* admitted)
 cgrusauskas@paulweiss.com
 ANDREA M. KELLER (*Pro Hac Vice* admitted)
 akeller@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
 & GARRISON LLP**
 1285 Avenue of the Americas
 New York, NY 10019
 Telephone: (212) 373-3000
 Facsimile: (212) 757-3990

Attorneys for Defendants
 UBER TECHNOLOGIES, INC.;
 RASIER, LLC; and RASIER-CA, LLC

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF JENNIFER
 HANDLEY IN SUPPORT OF
 DEFENDANTS' MARCH 24, 2025 BRIEF
 PURSUANT TO SPECIAL MASTER
 ORDER NO. 2, § III(6)**

This Document Relates to:
 ALL ACTIONS

DECLARATION OF JENNIFER HANDLEY

I, Jennifer Handley, having personal knowledge of the following state:

1. I am the Senior Legal Director, Global Safety, at Uber. I was first employed by Uber in December 2018 and have worked as in-house counsel for the past 6 years. My previous roles include Senior Counsel, Safety and Legal Director, Safety. In my current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal advice to Uber's leadership and employees related to safety issues, procedures, and policy, among other legal advice. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's March 24, 2025 brief pursuant to Special Master Order No. 2, § III(6) (ECF 2357). The facts set forth herein are true and correct and are based on my own personal knowledge, and I could and would competently testify thereto if called.

2. I have reviewed the document identified in the privilege log as JCCP_MDL_PRIVLOG005830. I am familiar with the issues discussed and individuals in this email chain from working as in-house legal counsel at Uber at this time. This document is an email thread that begins with an email from Mike Haas, dated May 14, 2021. Mr. Haas sent this email at the direction of Uber's in-house legal counsel, as part of his role at that time as Senior Legal Project Manager for Uber's Safety Legal Special Investigations team. In this role, as demonstrated in the May 14, 2021 email, Mr. Haas shares information at my and the legal team's direction, to facilitate the in-house team's provision of legal advice because the in-house team anticipated the potential for future litigation regarding safety-related incidents. In preparing this declaration, I also considered a separate email that I have from then-Senior Legal Director, Safety, Scott Binnings dated May 14, 2021. Mr. Binnings replied to Mr. Haas and contemporaneously confirmed that he and I were engaged in providing legal advice on the issue raised by Mr. Haas and that we directed further review and investigation in anticipation of litigation.

I declare under penalty of perjury that the foregoing is true and correct.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Executed in Denver, Colorado on March 24, 2025.

By: Jennifer Handley
Jennifer Handley